

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

-----X	:	
In re	:	
	:	Chapter 9
	:	
CITY OF DETROIT, MICHIGAN,	:	Case No. 13-53846
	:	
Debtor.	:	Hon. Steven W. Rhodes
	:	
	:	
-----X		

**EX PARTE MOTION OF FINANCIAL GUARANTY  
INSURANCE COMPANY FOR AN ORDER AUTHORIZING IT TO  
FILE AN OBJECTION TO THE FOURTH AMENDED PLAN FOR THE  
ADJUSTMENT OF DEBTS OF THE CITY OF DETROIT IN EXCESS OF PAGE LIMIT**

Financial Guaranty Insurance Company (“FGIC”) hereby moves the Court for the entry of an order authorizing FGIC to file the *Objection of Financial Guaranty Insurance Company to Plan for the Adjustment of Debts of the City of Detroit* (the “Objection”) in excess of the page limitations of Rule 7.1(d)(3)(A) of the Local Rules for the United States District Court for the Eastern District of Michigan (the “Local Rules”) and Rule 9014-1(e) of the Local Rules for the United States Bankruptcy Court for the Eastern District of Michigan (the “Local Bankruptcy Rules”), to the extent either limitation applies. In support of this motion, FGIC states as follows:

1. Although FGIC has taken great care to craft a concise, pointed objection, FGIC requires twenty-six pages (inclusive of the signature block) to meaningfully respond to the numerous and complex issues presented by the *Fourth Amended Plan for the Adjustment of Debts of the City of Detroit, dated May 5, 2014* [Docket No. 4392] (the “Plan”).

2. At twenty-six pages, the Objection exceeds the page limitations provided in the Local Rules and the Local Bankruptcy Rules. See Local Rule 7.1(d)(3)(A) (providing that “[t]he

text of a brief supporting a motion or response, including footnotes and signatures, may not exceed 25 pages. A person seeking to file a longer brief may apply *ex parte* in writing setting forth the reasons.”); Local Bankruptcy Rule 9014-1(e) (providing a twenty-page limitation for certain briefs, which do not include objections to the approval of a plan of adjustment).

3. To the extent either rule applies to the Objection, FGIC requests entry of an order expanding the applicable page limitation.

**WHEREFORE**, FGIC respectfully requests that this Court: (i) enter an order substantially in the form attached hereto as Exhibit 1, granting the relief sought herein; and (ii) grant such other and further relief to FGIC as the Court may deem proper.

Dated: May 12, 2014

Respectfully submitted,

/s/ Alfredo R. Pérez  
Alfredo R. Pérez  
WEIL, GOTSHAL & MANGES LLP  
700 Louisiana Street, Suite 1600  
Houston, TX 77002  
Telephone: (713) 546-5000  
Facsimile: (713) 224-9511  
Email: alfredo.perez@weil.com

Ernest J. Essad Jr.  
Mark R. James  
WILLIAMS, WILLIAMS, RATTNER &  
PLUNKETT, P.C.  
280 North Old Woodward Avenue, Suite 300  
Birmingham, MI 48009  
Telephone: (248) 642-0333  
Facsimile: (248) 642-0856  
Email: EJEssad@wwrplaw.com  
Email: mrjames@wwrplaw.com

*Attorneys for Financial Guaranty Insurance  
Company*

### **SUMMARY OF ATTACHMENTS**

The following documents are attached to this Motion, labeled in accordance with Local Rule 9014-1(b).

Exhibit 1	Proposed Form of Order
Exhibit 2	None
Exhibit 3	None
Exhibit 4	Certificate of Service
Exhibit 5	None
Exhibit 6	None

**EXHIBIT 1**

**Proposed Form of Order**

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
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CITY OF DETROIT, MICHIGAN, : Case No. 13-53846  
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**EX PARTE ORDER AUTHORIZING  
FINANCIAL GUARANTY INSURANCE COMPANY TO  
FILE AN OBJECTION TO THE FOURTH AMENDED PLAN FOR THE  
ADJUSTMENT OF DEBTS OF THE CITY OF DETROIT IN EXCESS OF PAGE LIMIT**

This matter coming before the Court on the *Ex Parte Motion of Financial Guaranty Insurance Company for an Order Authorizing It to File an Objection to the Fourth Amended Plan for the Adjustment of Debts of the City of Detroit in Excess of Page Limit* (the "Motion")<sup>1</sup> and the Court being fully advised in the premises;

**IT IS HEREBY ORDERED THAT:**

1. The Motion is GRANTED.
2. FGIC may file its *Objection of Financial Guaranty Insurance Company to Plan for the Adjustment of Debts of the City of Detroit* in excess of the applicable page limitation.

Dated: \_\_\_\_\_, 2014  
Detroit, Michigan

\_\_\_\_\_  
**STEVEN RHODES**  
**UNITED STATES BANKRUPTCY JUDGE**

<sup>1</sup> Capitalized terms used and not otherwise defined herein shall have the meanings ascribed to them in the Motion.

**EXHIBIT 4**

**Certificate of Service**

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

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	:	
CITY OF DETROIT, MICHIGAN,	:	Case No. 13-53846
	:	
Debtor.	:	Hon. Steven W. Rhodes
	:	
-----X	:	

**CERTIFICATE OF SERVICE**

I hereby certify that on May 12, 2014 the *EX PARTE MOTION OF FINANCIAL GUARANTY INSURANCE COMPANY FOR AN ORDER AUTHORIZING IT TO FILE AN OBJECTION TO THE FOURTH AMENDED PLAN FOR THE ADJUSTMENT OF DEBTS OF THE CITY OF DETROIT IN EXCESS OF PAGE LIMIT* was filed and served via the Court's electronic case filing and noticing system to all registered users that have appeared in this Case.

/s/ Alfredo R. Pérez  
Alfredo R. Pérez  
WEIL, GOTSHAL & MANGES LLP  
700 Louisiana Street, Suite 1600  
Houston, TX 77002  
Telephone: (713) 546-5000  
Facsimile: (713) 224-9511  
Email: alfredo.perez@weil.com

Dated: May 12, 2014